

## REMARKS

Reconsideration of this application is respectfully requested in view of the foregoing amendment and the following remarks.

Claims 1-5 and 7-15 remain pending in this application. No amendments have been made to the claims. For the reasons set forth below, Applicants respectfully submit that all of the claims pending herein are in condition for allowance.

In the Office Action,

- Claims 1, 3-5, 7 and 9-12 were rejected under 35 U.S.C. § 103(a) as being unpatentable over McIntosh (U.S. 2003/0171119) in view of Serbetcioglu et al. (U.S. Patent 5,719,918) and Haumont (U.S. 2005/0108417);
- Claims 2 and 8 were rejected under 35 U.S.C. § 103(a) as being unpatentable over McIntosh in view of Serbetcioglu, Haumont, and further in view of Lam et al. (U.S. patent 6,782,276); and
- Claims 13-15 were rejected under 35 U.S.C. § 103(a) as being unpatentable over McIntosh in view of Serbetcioglu, Haumont, and further in view of Chambers (U.S. 5,854,982).

To the extent these grounds of rejection might again be applied to claims presently pending in this application, they are respectfully traversed.

The presently claimed invention is directed to methods and systems for routing messages, and in particular, foreign-initiated messages that are routed using the SS7 protocol. In the claims, an intermediary receives a request to route a message (typically an SMS message). Conventionally, such routing requests are received by a telecommunication carrier's infrastructure including a home location register (HLR) and associated mobile switching center (MSC). In the claimed invention, on the other hand, the routing request is received by an intermediary that "appears" like the conventional infrastructure, but where, in fact, no such infrastructure exists. As a subset of the steps that the intermediary must perform to appear as, e.g., an MSC to the third party from which the request was received, the intermediary's response

to the routing request must include an International Mobile Subscriber Identity (IMSI) value (see, e.g., paragraph [0032] of the present specification).

In accordance with the express limitations in the claims, and in connection with providing an IMSI value in the intermediary's response, an “artificial” IMSI value is dynamically created and is based, at least in part, on the carrier to which the message is to be routed. For example, as explained in paragraphs [0032] and [0037], the dynamically created artificial IMSI value is generated using the mobile country code (MCC) and mobile network code (MNC) of the destination carrier, along with additional data including an internal receiver ID and an internal index, both of which are assigned by the intermediary.

At least one advantage of this scheme is explained in paragraph [0039] of the specification. Specifically, the claimed artificial IMSI creates a virtual subscriber. Moreover, the created IMSI value is “allowable” and “routeable” in terms of compliance with a SRIForSM message and a follow-on FSM message, where these messages are transmitted over SS7.

Haumont was cited as disclosing the “dynamic selection of an international subscriber identification (IMSI)” as indicated, e.g., on page 4 of the Office Action. Applicants respectfully disagree that Haumont discloses the claimed “dynamically creating” element at issue.

Haumont discloses a method that has the effect of reducing inquiries to network components, such as HLRs. See, e.g., paragraphs [0025] and [0041]. In the disclosed method, as explained in paragraph [0042] and shown in Figure 3, a query 304 is made to the HLR 306 and information 310 that includes the IMSI of mobile subscriber 300 is returned. That information (including the IMSI) is then forwarded to SMSC 314 for further processing. In other words, the SMSC 314 can forward a message 312B to MSC/VLR 316 without also having to query HLR 306.

Notably, the IMSI value that is supplied by the HLR 306 in Haumont is an actual or real IMSI of MS 300, the intended recipient of the SMS message being sent. This IMSI value, however, is neither created dynamically nor is it artificial, as is required by the claims. The IMSI that is supplied is a predetermined IMSI value that is, as is well-known in the art, previously assigned. Stated alternatively, the Examiner has relied on Haumont as disclosing dynamic

selection of an IMSI, but the claims are directed to dynamic creation of an artificial IMSI value. Thus, Haumont is entirely unrelated to specific limitations of the claims.

Since Haumont does not disclose or suggest “dynamically creating” an “artificial” IMSI value, any combination of Haumont with the other prior art of record would still not result in the claimed invention. Reconsideration and withdrawal of the applied §103(a) rejection of claims 1, 3-5, 7 and 9-12 is therefore respectfully urged.

Further, Lam et al. fail to overcome the deficiencies of Haumont described above. Consequently, claims 2 and 8 are likewise believed to be allowable over the prior art of record.

Finally, Chambers was cited against previously-added claims 13-15. Those claims recite a specific formula for the claimed dynamically created artificial IMSI value. Specifically, each of claims 13-15 recites that the artificial IMSI value comprises (1) a mobile country code (MCC), (2) a mobile network code (MNC), (3) an internal receiver ID associated with an intermediary component that processed an SRI for SM message, and (4) an index number assigned by the intermediary.

Figure 2 of Chambers shows “an exemplary structure of a prior art memory location for an IMSI.” See column 4, lines 60-61 and column 6, lines 61-62 of Chambers. Chambers also discloses that the IMSI contains a “number of information bearing segments” that include an MCC and MNC “and other subscription information.” See column 6, line 62 to column 7, line 5 of Chambers. Thus, while Chambers appears to disclose the first of the two recited elements of the dynamically created IMSI value of the present invention, Chambers is silent regard the last two recited elements of that value. The “other subscription information” mentioned by Chambers has to do with the mobile subscriber or end-user. However elements (3) and (4) of the dynamically created IMSI in accordance with claims 13-15 have to do with information related specifically to the intermediary. Thus, Applicants respectfully submit that Chambers does not disclose all of the elements of claims 13-15. As such, any combination of Chambers with the other prior art of record would not result in the claimed invention as set forth in claims 13-15.

In view of the foregoing all of the claims in this case are believed to be in condition for allowance. Should the Examiner have any questions or determine that any further action is

desirable to place this application in even better condition for issue, the Examiner is encouraged to telephone Applicants' undersigned representative at the number listed below.

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